

FILED

3/22/2023

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: JB
Deputy

UNITED STATES OF AMERICA

Plaintiff

v

RON KUHLMEYER

Defendant

Case No: 7:23-CR-00057

INDICTMENT

COUNTS 1-5: 18 U.S.C. § 1462(a) –
Importation or Transportation of Obscene
Matters

COUNT 6-10: 18 U.S.C. § 1466A(a)(1)
Obscene Visual Representations of the
Sexual Abuse of Children

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 1462(a)]

On or about October 28, 2022, in the Western District of Texas, Defendant,

RON KUHLMEYER,

knowingly used an interactive computer service for carriage in interstate and foreign commerce, an obscene matter, to wit: obscene story 1, in violation of Title 18, United States Code, Section 1462(a).

COUNT TWO

[18 U.S.C. § 1462(a)]

On or about November 1, 2022, in the Western District of Texas, Defendant,

RON KUHLMEYER,

knowingly used an interactive computer service for carriage in interstate and foreign commerce, an obscene matter, to wit: obscene story 2, in violation of Title 18, United States Code, Section 1462(a).

COUNT THREE

[18 U.S.C. § 1462(a)]

On or about November 1, 2022, in the Western District of Texas, Defendant,

RON KUHLMEYER,

knowingly used an interactive computer service for carriage in interstate and foreign commerce, an obscene matter, to wit: obscene story 3, in violation of Title 18, United States Code, Section 1462(a).

COUNT FOUR

[18 U.S.C. § 1462(a)]

On or about November 7, 2022, in the Western District of Texas, Defendant,

RON KUHLMEYER,

knowingly used an interactive computer service for carriage in interstate and foreign commerce, an obscene matter, to wit: obscene story 4, in violation of Title 18, United States Code, Section 1462(a).

COUNT FIVE

[18 U.S.C. § 1462(a)]

On or about November 7, 2022, in the Western District of Texas, Defendant,

RON KUHLMEYER,

knowingly used an interactive computer service for carriage in interstate and foreign commerce, an obscene matter, to wit: obscene story 5, in violation of Title 18, United States Code, Section 1462(a).

COUNT SIX

[18 U.S.C. § 1466A(a)(1)]

On or about November 7, 2022, in the Western District of Texas, Defendant,

RON KUHLMEYER,

did knowingly produce, distribute, receive, and possess with the intent to distribute, a visual depiction of any kind, including a drawing that depicts a minor engaging in sexually explicit conduct and is obscene, to-wit: a drawing of two prepubescent girls with the youngest one simulating fellatio on an adult male's penis and this visual depiction had been mailed, or shipped or transported in interstate or foreign commerce by any means, including by computer, or was produced using materials that have been mailed, or that have been shipped or transported in interstate or foreign commerce by any means, including by computer.

A violation of Title 18, United States Code, Section 1466A(a)(1).

COUNT SEVEN
[18 U.S.C. § 1466A(a)(1)]

On or about November 7, 2022, in the Western District of Texas, Defendant,

RON KUHLMEYER,

did knowingly produce, distribute, receive, and possess with the intent to distribute, a visual depiction of any kind, including a drawing that depicts a minor engaging in sexually explicit conduct and is obscene, to-wit: a drawing of two prepubescent females the younger performing oral intercourse on the older and this visual depiction had been mailed, or shipped or transported in interstate or foreign commerce by any means, including by computer, or was produced using materials that have been mailed, or that have been shipped or transported in interstate or foreign commerce by any means, including by computer.

A violation of Title 18, United States Code, Section 1466A(a)(1).

COUNT EIGHT
[18 U.S.C. § 1466A(a)(1)]

On or about November 7, 2022, in the Western District of Texas, Defendant,

RON KUHLMEYER,

did knowingly produce, distribute, receive, and possess with the intent to distribute, a visual depiction of any kind, including a drawing that depicts a minor engaging in sexually explicit conduct and is obscene, to-wit: a drawing of prepubescent female with an adult male's erect penis penetrating the prepubescent female and this visual depiction had been mailed, or shipped or transported in interstate or foreign commerce by any means, including by computer, or was produced using materials that have been mailed, or that have been shipped or transported in interstate or foreign commerce by any means, including by computer.

A violation of Title 18, United States Code, Section 1466A(a)(1).

COUNT NINE
[18 U.S.C. § 1466A(a)(1)]

On or about November 7, 2022, in the Western District of Texas, Defendant,

RON KUHLMAYER,

did knowingly produce, distribute, receive, and possess with the intent to distribute, a visual depiction of any kind, including a drawing that depicts a minor engaging in sexually explicit conduct and is obscene, to-wit: a drawing of two prepubescent females one of which is being penetrated by an adult male's erect penis while the other prepubescent female simulates masturbation and this visual depiction had been mailed, or shipped or transported in interstate or foreign commerce by any means, including by computer, or was produced using materials that have been mailed, or that have been shipped or transported in interstate or foreign commerce by any means, including by computer.

A violation of Title 18, United States Code, Section 1466A(a)(1).

COUNT TEN
[18 U.S.C. § 1466A(a)(1)]

On or about November 7, 2022, in the Western District of Texas, Defendant,

RON KUHLMAYER,

did knowingly produce, distribute, receive, and possess with the intent to distribute, a visual depiction of any kind, including a drawing that depicts a minor engaging in sexually explicit conduct and is obscene, to-wit: a drawing of a prepubescent female performing fellatio on adult penises and this visual depiction had been mailed, or shipped or transported in interstate or foreign commerce by any means, including by computer, or was produced using materials that have been mailed, or that have been shipped or transported in interstate or foreign commerce by any means, including by computer.

A violation of Title 18, United States Code, Section 1466A(a)(1).

A TRUE BILL

FOREPERSON

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By: *Adam Braskich*
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